

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BELLSOUTH)	
TELECOMMUNICATIONS, LLC FOR)	
DECLARATORY ORDER REGARDING)	CASE NO.
INTERCONNECTION WITH CENTRAL)	2015-00227
KENTUCKY NETWORK FOR 911/E911)	
SERVICES TO PUBLIC SAFETY ANSWERING)	
POINTS)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION TO
BELLSOUTH TELECOMMUNICATIONS, INC. D/B/A AT&T KENTUCKY

BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission an original in paper medium and an electronic version of the following information. The information requested herein is due on or before April 7, 2016. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

AT&T Kentucky shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which AT&T Kentucky fails or refuses to furnish all or part of the requested information, AT&T Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, AT&T Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the informal conference memo filed on November 25, 2015, page 2, where one participant alleged that Kentucky State Police and Louisville Metro Government provide the same or similar 911 functions as those provided by Central Kentucky Network ("CKN"), whereby CKN receives, routes, and distributes 911 calls to Public Safety Answering Points ("PSAPs").

- a. Describe the framework by which AT&T Kentucky sends 911 traffic to Kentucky State Police and explain whether Kentucky State Police then routes and distributes 911 calls to PSAPs.

b. Describe any agreements AT&T Kentucky has with Kentucky State Police regarding the terms and conditions for exchanging 911 traffic.

c. Describe the framework by which AT&T Kentucky sends 911 traffic to Louisville Metro Government and explain whether Louisville Metro Government then routes and distributes 911 calls to PSAPs.

d. Describe any agreements AT&T Kentucky has with Louisville Metro Government regarding the terms and conditions for exchanging 911 traffic.

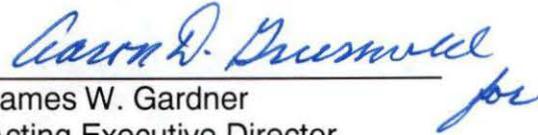
2. State whether AT&T Kentucky provides service to any other governmental entity where AT&T sends 911 traffic to the governmental entity and the governmental entity then receives, routes, and distributes 911 calls to PSAPs. If so, describe any agreements AT&T Kentucky has with said governmental entity regarding the terms and conditions for exchanging 911 traffic.

3. In the event that the Commission finds that CKN is not a “utility” or “telecommunications service” as defined by KRS Chapter 278, explain what agreements AT&T Kentucky will require to ensure the safe and reliable delivery of 911 traffic to CKN.

4. Refer to the Direct Testimony of J. Scott McPhee (“McPhee Testimony”), pages 10–11. Explain whether there are existing or pending federal or Kentucky laws and regulations that limit carrier liability for delivering 911 calls.

5. Refer to the McPhee Testimony, page 7, which states “The typical industry practice is to have an agreement in place that clearly defines the responsibilities of each party to the traffic exchange.” State whether the typical industry practice to have an

agreement in place that defines the responsibilities of each party to 911 traffic exchange includes both commercial agreements and interconnection agreements.



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DATED MAR 18 2016

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